



**CALIFORNIA FARM BUREAU FEDERATION**  
**GOVERNMENTAL AFFAIRS DIVISION**

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December 17, 2004

Randy Segawa  
California Department of Pesticide Regulation  
1001 I Street, P.O. Box 4015  
Sacramento, CA 95812 – 4015

**Re: California Department of Pesticide Regulation Environmental Justice Pilot Project, Pesticide Air Monitoring in a Rural Community**

Dear Mr. Segawa:

The California Farm Bureau Federation would like to submit the following comments regarding the California Department of Pesticide Regulations' Environmental Justice Pilot Project. We appreciate the availability DPR and Cal-EPA staff has shown the agricultural community to discuss our questions and comments about this project and look forward to continued dialogue as this effort progresses.

A predominate concern the agricultural community has is how this project will be financed. While we believe existing studies could meet the objectives of DPR's Pilot Project without having to exert additional resources for monitoring and analysis, we understand that there is great interest from Cal-EPA to pursue this and three other pilot projects.

At the December 3, 2004 Pesticide Management Advisory Committee meeting we were advised that DPR has to cut \$1.5M from their 2004-05 budget to accommodate extra costs for personnel leave and retirement contributions. If the EJ pilot project and new personnel expenditures are taken from the reserve or shifted from other areas, we do not want to be told in the next budget cycle that the mill tax must be increased because the reserve is too low or there is not enough money to pay for necessary programs. We believe the administration should make plans to secure the estimated \$500,000 in general funds to pay for this proposed pilot project.

In developing the project, DPR should consider taking inventory of existing scientific peer reviewed studies and avoid any duplication. In particular, efforts by DPR in Lompoc and by USEPA in McFarland Park have already demonstrated that the amount of detectable pesticide was below any levels likely to cause adverse health effects. These studies will provide protocol that should be acceptable by all interested parties.

The following comments focus on the three issues cited in the DPR proposal

### **1. What should be the specific objectives of the air monitoring study?**

We agree that the objectives should be simple, measurable, attainable, realistic and timely. In addition, we would like to see it emphasized that they are scientifically based. Since there will only be one community monitored at this point, it will be important to clarify from the start that this presents scientific limitations and that drawing conclusions from a study that had no replication or controls (an urban community with no agricultural pesticide exposure) is not the objective. The objective is to establish a protocol for exposure assessment.

While this project is focused on pesticide exposure, it must be understood that not including other potential environmental contributors prevents any scientific conclusions from being drawn. The Lompoc and McFarland Park studies included exposure to metals, vehicle exhaust, natural environmental contributors (i.e. radon, asbestos and pollen) and other factors so that a complete exposure assessment was performed. Until these other air contaminants are included, this exposure assessment will not present a comprehensive picture.

### **2. How should DPR select the community to monitor?**

The Central Valley is very diverse, not only in crops and topography but in ethnicity and economic diversity. This makes it very difficult to select one representative area, as one community cannot be a determination of what the air quality is like in all rural communities in the Central Valley. We suggest that the community should be agriculturally based with a balance of people of both ethnic and economic diversity. Schools should be near rural agricultural production. There should be agricultural diversity; the cropping patterns should change from winter to summer with both winter and crops.

Instead of seeking communities with unique characteristics, such as a high percentage of children or persistently low wind speed, it should be a community that reflects a typical community with an average number of children and a wind speed that compares with other parts of the Valley. This project is being developed to establish a protocol; so standard measurements and criteria should be used with equal weight assigned to each criterion. Once a standard methodology is established any aberrant activities (i.e. higher than normal pesticide exposure) would be detected and the whether this represented a health risk could then be fairly and accurately determined. Purposefully weighting certain criteria as having more impact than others in selecting a community for the pilot could lead to subjective reasoning and presuppose conclusions.

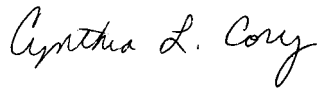
**3. How should DPR select the pesticides to monitor?**

DPR should select the 20 most commonly used pesticides based upon a minimum of a three-year average by volume and season as reported in the Pesticide Use Reports. Sampling periods should reflect when these pesticides are normally used to accurately reflect interaction between normal application methods and meteorological conditions

In conclusion, CFBF believes that DPR should utilize the Lompoc and McFarland studies in the development of any EJ pesticide pilot project to the maximum extent possible. Also, additional general funding needs to be secured before this project is initiated

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Cynthia L. Cory".

Cynthia L. Cory  
Director, Environmental Affairs